

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

In the Matter of:

Carolina Post Office
Carolina, West Virginia 26563

Docket No. A2011-95

UNITED STATES POSTAL SERVICE SUPPLEMENTAL
COMMENTS REGARDING APPEAL
(December 7, 2011)

On September 28, 2011, the Postal Regulatory Commission (Commission) received an appeal postmarked September 21, 2011, from postal customer Jack Fuller (Petitioner) objecting to the discontinuance of the Post Office at Carolina, West Virginia. On September 30, 2011, the Commission issued Order No. 888, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). In accordance with Order No. 888, the administrative record was filed with the Commission on October 13, 2011. The Postal Service filed comments on November 22, noting that at the time the comments were filed, the original petitioner, Mr. Fuller, had not submitted a Form 61 or any other pleading. Subsequently, on November 29, the Commission posted a Notice of Delayed Posting of Participant Statement which explained that Mr. Fuller submitted supplemental comments received by the Commission on November 1, but the documents inadvertently were not posted to the website contemporaneously upon receipt. The Postal Service therefore requests that the Commission accept these supplemental comments in response to Mr. Fuller's November 1 submission.

Mr. Fuller's supplemental comments include a petition signed by many members of the Carolina community and raises concerns similar to those raised by petitioner Taylor and the other participants in this appeal. He underscores the mountaintop location of his town, the high percentage of elderly residents, the inconvenience that it will cause postal customers to have to travel to Idamay or Worthington to conduct postal business in comparison to the ease of access which they currently enjoy, and their preference for receiving mail and packages in a secure, temperature controlled environment. He also notes that the distances to Idamay and Worthington are greater when actually driven than were documented in the administrative record. Most of these issues were addressed in the Postal Service's original comments.

For the purposes of responding specifically to Mr. Fuller's comments, the Postal Service will concede that the actual driving distance between two points may be different than the distances which are calculated by various on-line resources between two ZIP Codes or street addresses. In this case, though, there is no dispute that both the Idamay and the Worthington Post Offices are less than 3.5 miles from Carolina. This is a distance that Carolina residents currently traverse to conduct most of their service and retail business transactions. Additionally, in many cases the rural route delivery service that Carolina residents will receive if the Final Determination is implemented can provide postal services at the customer's mailbox or door.

The Postal Service considered the incidence of vandalism and theft from rural boxes and cluster boxes and consulted with the U.S. Postal Inspection Service

concerning reports of vandalism and theft in Carolina. Only one such incident had been reported recently, as documented in items 14 and 15 of the administrative record.

Another related concern is that of the difference between the temperature controlled environment that the Carolina Post Office provides its box customers and the unregulated temperature that would be provided by a rural route box or a cluster box. The Postal Service understands that this is a concern for customers who have not previously had rural or cluster box delivery. However, customers with rural route delivery and cluster boxes routinely receive medications and other items through the mail. Perishable items that are not properly packaged to protect their contents are not mailable.

Conclusion

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of closing the Carolina Post Office on the provision of postal services and on the Carolina community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, and other factors, consistent with the mandate of 39 U.S.C. § 404(d)(2)(A).

After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that after the discontinuance, the Postal Service will continue to provide effective and regular service to Carolina customers. The Postal Service

respectfully submits that this conclusion is consistent with and supported by the administrative record and is in accord with the policies stated in 39 U.S.C. § 404(d)(2)(A). The Postal Service's decision to close the Carolina Post Office should, accordingly, be affirmed.

The Postal Service respectfully requests that the determination to close the Carolina Post Office be affirmed.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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